

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116

TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7645
WWW.SWIDLAW.COM

NEW YORK OFFICE
919 THIRD AVENUE
NEW YORK, NY 10022-9998
(212) 758-9500 FAX (212) 758-9526

June 22, 1999

RECEIVED
JUN 22 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Magalie Roman Salas, Secretary
Federal Communications Commission
Portals II
445 12th Street, N.W.
Suite TW-A325
Washington, D.C. 20554

Re: File No. NSD-L-98-121, CC Docket 96-98; CTSI, Inc. IntraLATA Toll Dialing
Parity Implementation Plans

Dear Ms. Salas:

Pursuant to Public Notice,¹ enclosed for filing with the Federal Communications Commission ("Commission") are four copies of the CTSI, Inc. IntraLATA Toll Dialing Parity Implementation Plan for the State of New York. New York has not yet taken action on this plan. Consequently, the plan is being filed with the Commission in order to conform with the Commission's Order directing local exchange carriers ("LECs") to file their plans with the Commission on June 22, 1999 if a state commission has not yet acted on a LEC's intraLATA toll dialing parity implementation plan.²

No. of Copies rec'd 014
LIST ABCDE

¹ Instructions for Filing IntraLATA Toll Dialing Parity Plans, DA 99-1190, *Public Notice*, (June 18, 1999).

² Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket 96-98, NSD File No. L-98-121, *Order*, FCC 99-54 para. 7 (rel. Mar. 23, 1999).

Magalie Roman Salas
June 22, 1999
Page 2

Kindly date-stamp the extra copy of this filing and return it to us. Thank you for your attention to this matter. Should you have any questions, please direct them to Kathleen L. Greenan at (202) 945-6922.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Greenan", with a stylized flourish at the end.

Kathleen L. Greenan
Counsel for CTSI, Inc.

Enclosures

cc: Al McCloud, Commission (2 copies, w/ enclosures)
Mark DeFalco
Russell Blau
Robin Cohn

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7647
WWW.SWIDLAW.COM

DOCKET FILE COPY ORIGINAL

NEW YORK OFFICE
919 THIRD AVENUE
NEW YORK, NY 10022-9998
(212) 758-9500 FAX (212) 758-9526

April 21, 1999

VIA OVERNIGHT MAIL

Debra Renner, Acting Secretary
New York Public Service Commission
Agency Building 3
Three Empire State Plaza
Albany, NY 12223-1350

RECEIVED
JUN 22 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Return Copy

Re: CTSI, Inc. IntraLATA Toll Dialing Parity Plan

Dear Ms. Renner:

Enclosed please find an original and nine (9) copies of CTSI, Inc.'s ("CTSI") IntraLATA Toll Dialing Parity Plan filed pursuant to the Federal Communications Commission's Order regarding intraLATA toll dialing parity.¹ If the Commission requires, CTSI will file tariff revisions in accordance with this Plan.

Please date-stamp the enclosed extra copy of this filing and return it in the self-addressed stamped envelope provided. If you have any questions regarding the enclosed Plan, please do not hesitate to contact me. Thank you for your attention to this matter.

Very truly yours,



Robin Cohn
Kathleen L. Greenan

Counsel for CTSI, Inc.

cc: Mark DeFalco
Ron Reeder

¹ *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, Order*, CC Docket No. 96-98, NSD File No. 98-121 (released March 23, 1998).

CTSI, INC.
INTRALATA PRESUBSCRIPTION IMPLEMENTATION PLAN

INTRODUCTION

In accordance with certain Federal Communications Commission ("FCC") Orders,¹ CTSI, Inc. ("CTSI") submits its implementation plan for intraLATA presubscription (the "Plan").²

CTSI will give end user customers the opportunity to designate a carrier for their intraLATA toll call traffic in those market areas where CTSI is a facilities-based local exchange service provider. IntraLATA toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

POLICIES

CTSI will deploy two-PIC (Primary Interexchange Carrier) technology in its switches. This technology will enable the customer to presubscribe to the same or a different carrier for their intraLATA and/or interLATA service.

CTSI will offer customers the ability to access all participating carriers by dialing the appropriate access code (10XXX/101XXX).

All eligible CTSI end user telephone line numbers will be presubscribed and must have a PIC associated with them.

CARRIER INFORMATION

Interexchange carriers will have the option of offering intraLATA service only or intraLATA and interLATA service.

Interexchange carriers will have the option of participating in all market areas or in a specific market area.

¹ *In the Matter of Implementation of the Local Competition Provision of the Telecommunications Act of 1996*, CC Docket No. 96-98, *Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate InterLATA Toll Dialing Party or, in the Alternative, Various Other Relief*, Order (March 23, 1999); *In the Matters of the Local Competition Provisions of the Telecommunications Act of 1996*, Second Report and Order, CC Docket No. 96-98 (August 8, 1996).

² CTSI is already offering intraLATA presubscription to its customers and will formalize the process as set forth herein.

Interexchange carriers will be required to return a completed Non-Disclosure Agreement and Participation Agreement(s).

CTSI will not participate in billing disputes for intraLATA service between alternative competing interexchange carriers and their customers.

CTSI representatives will not initiate or accept three-way calls from alternative interexchange carriers to discuss presubscription.

Carriers wishing to participate will be requested to submit Access Service Requests/Translation Questionnaires to the Access Tandem owner and to CTSI.

CALL ELIGIBILITY/TOLL DIALING PLAN

A local service customer of CTSI will have calls routed according to the following plan:

If a CTSI Customer Dials:	The Call is Handled By/Routed To:
911	PSAP on originating line number
411/555-1212	CTSI Directory Assistance Operator
0-	CTSI Operator
0 + intraexchange number	IntraLATA Toll Provider
1 + 7 or 10 digits	IntraLATA Toll Provider
0 + 7 or 10 digits interexchange number	InterLATA Toll Provider
10XXX or 101XXXX + 0-	XXX/XXXX Carrier
10XXX or 101XXXX + 0 + 7 or 10 digits	XXX/XXXX Carrier
10XXX or 101XXXX + 7 or 10 digits	XXX/XXXX Carrier

If a CTSI customer originates a call to a carrier Operator by dialing 00-, the call will be routed to the PIC on that customer's line. If the customer originates a call to a carrier Operator by dialing an access code (e.g., 10XXX/101XXXX + 0-), the call will be routed to the XXX/XXXX carrier. In both cases, the carrier's switch is responsible for routing this call to the carrier's Operator or to an announcement.

NETWORK INFORMATION

All originating intraLATA traffic will initially be routed via the incumbent Local Exchange Carrier (LEC) Access Tandem(s). Following conversion, direct trunks between the CTSI switch and the interexchange carrier location(s) may be provisioned where traffic volumes warrant.

Interexchange carriers must have Feature Group D trunks in place (or ordered) between their point of presence and the incumbent LEC Access Tandem(s).

CTSI will route all originating intraLATA traffic to the designated carrier and will only block traffic at the request of the end user customer and/or in compliance with regulatory requirements. Calls that cannot be completed to a carrier will be routed to an announcement.

CUSTOMER CONTACT INFORMATION

CTSI customer contact representatives will process customer initiated PIC selections to CTSI or to an alternative intraLATA carrier. Carriers will have the option of allowing the CTSI representative to process PIC requests on their behalf.

CTSI will not ballot or allocate their customer base. At the time of conversion, all customers will be "PIC'd" to CTSI unless another carrier is chosen by the particular customer.

CTSI customer contact representatives will not comment on a customer's choice of its intraLATA PIC when the customer contacts CTSI to change the PIC. CTSI customer contact representatives will respond to customer inquiries about intraLATA carriers in a competitively neutral fashion. If a customer requests information relating to carriers other than CTSI, a list of participating carriers will be read to that customer in random order by CTSI representatives.

If the intraLATA toll carrier selected by the customer permits CTSI to process orders on its behalf, CTSI will accept the PIC change request. If the customer selects an intraLATA toll carrier that does not allow CTSI to process PIC changes on its behalf, CTSI will provide the customer with the carrier's toll-free number (if provided by the carrier).

CTSI representatives will not discuss alternative carrier rates or services and will not provide customers with Carrier Identification Codes or access code dialing instructions.

PRESUBSCRIPTION INFORMATION

A \$5.00 PIC change charge will be incurred and billed to a CTSI customer for each eligible line where a PIC change is made. CTSI will offer its customers a 90-day grace period following Plan implementation during which the customers may change intraLATA carriers without a PIC change charge. Customers can make multiple PIC changes during these 90 days at no charge. After the 90-day period, CTSI will assess the \$5.00 PIC change charge. CTSI offers interexchange carriers the option of having the PIC charge billed to the carrier or to the customer.

New line customers, including customers adding lines, will have the opportunity to select a participating carrier, or they will be assigned a NO PIC designation. If a customer cannot decide upon an intraLATA carrier at the time of order, CTSI may extend a 30-day period following placement of the customer's service order for the customer to select an intraLATA carrier without charge. Such a customer will be assigned a NO PIC designation in the interim. After this 30-day period, CTSI will assess the \$5.00 PIC change charge as described above. Customers assigned a NO PIC designation as set forth in this paragraph will be required to dial an access code to reach an intraLATA carrier's network.

If a CTSI customer denies requesting a change in intraLATA toll providers as submitted by an intraLATA carrier, and the intraLATA carrier is unable to produce a Letter of Agency signed by the customer, the intraLATA carrier will be assessed a \$30.00 charge for the unauthorized PIC change and the PIC will be changed as per the customer's request, in addition to any other penalties authorized by law.

Alternative interexchange carriers may submit PIC changes to CTSI via a fax/paper interface.

CTSI will process intraLATA PIC selections in the same manner and under the same intervals of time as interLATA PIC changes.

Carriers will be required to submit PIC changes using the Customer Account Record Exchange (CARE) format via paper medium. CTSI will provide carriers with PIC order confirmation and reject information using the CARE format. Specific details regarding CARE will be provided to participating carriers.

For customers who change their local service provider from the incumbent LEC to CTSI and retain their incumbent LEC telephone number(s), CTSI, as part of the CARE PIC process, will provide the selected intraLATA carrier with both the retained (incumbent LEC) telephone number and the CTSI telephone number.

Dated: April 21, 1999